



University of Pittsburgh
Medical Center

200 Lothrop Street
Pittsburgh, PA 15213-2582

MEMORANDUM

TO: D. S. [REDACTED], MS, Administrative Vice Chairman
Health Sciences
Institutional Review Board

FROM: A. P. [REDACTED], MD
Department of Surgery
c/o Clinical Trials Program, Department of Anesthesiology/CCM

DATE: May 8, 1998

RE: IRB #971174: Phase 2b Safety and Efficacy Study of Hu23F2G in Subjects
with Hemorrhagic Shock (AHS02, 10/10/97; Amendment 1, 10/17/97;
Amendment 2, 11/25/97; Amendment 3, 2/3/98; Amendment 4, 3/11/98)

The attached advertisement appeared in the following newspapers on April 23, 1998: *Pittsburgh Post-Gazette, Tribune-Review, New Castle News, Clarion News, Erie Daily Times, The Vindicator*. During the period following ad placement, we have received no questions or comments about the study. We have now completed all planned activities for community consultation and public disclosure related to this study, as approved by the IRB. Please provide a letter stating the following:

“The Community Consultation and Public Disclosure process required for approval has been completed to the satisfaction of the IRB, and patient enrollment may begin under waiver of consent as of [specify date].”

The study sponsor requests that the letter include a brief summary of the activities carried out for Community Consultation and Public Disclosure and have a copy of the approved ad attached.

In addition, enclosed please find the Legal Representative Consent Form with waiver of consent language restored at the top of page 2, per our memo to the IRB dated March 12, 1998.

If you require any further information, please let me know.

Enclosures

Researchers to study new drug for shock in trauma patients

UPMC Health System in Pittsburgh, Pa., is one of a number of sites nationwide that have been asked to help determine the effectiveness of a new treatment for trauma victims in shock. The study involves an experimental drug that will be given to adult patients with life-threatening injuries. The drug, developed by ICOS Corporation, will be given for emergency treatment along with standard therapy. The drug is derived from human and animal proteins and is processed to make it safe from viruses. Typical side effects seen in other studies of the drug include various infections. These studies have found that the risk of infection can be controlled with antibiotics.

Normally, the U.S. Food and Drug Administration (FDA) requires that new drugs and therapies be tested in human patients after an informed consent has been obtained. Recently, the FDA ruled that under strict circumstances, unconscious patients whose lives are in danger or for whom there is no family member available to consent may be given experimental treatment when there is no proven alternative therapy.

In accordance with the revised FDA guidelines, UPMC researchers would like to make this experimental drug available to unconscious trauma patients who do not have a family member available to consent. This drug must be administered within three hours of traumatic injury to be effective. Every effort will be made to obtain the consent of a family member during this three-hour period. If consent cannot be obtained before this period has expired, patients or their families would be notified as soon as possible about inclusion in the research study.

The FDA requires potential study sites to notify the public for comment before the study may proceed. Please address comments to:

██████████, MD
Department of Surgery
UPMC Presbyterian, Room A-1010
UPMC Health System
200 Lothrop Street
Pittsburgh, PA 15213-2582
or call (412) ██████████

or

██████████, MS
University of Pittsburgh
Institutional Review Board
219 Nese-Barkan Building Annex
3811 O'Hara Street
Pittsburgh, PA 15213-2593
or call (412) ██████████



UPMC HEALTH SYSTEM



University of Pittsburgh
Medical Center

200 Lothrop Street
Pittsburgh, PA 15213-2582

MEMORANDUM

To: S. P. [REDACTED]
ICOS Corporation

From: A. P. [REDACTED], MD
Principal Investigator

Date: June 5, 1998

Re: Phase 2b Safety and Efficacy Study of HU23F2G in Subjects with Hemorrhagic Shock (AHS02)

Summarized below are the activities undertaken to meet the requirements of 21 CFR 50.24 as to consultation and notification of the community for the above-referenced study.

1. *Community consultation.* The UPMC IRB identified the City of Pittsburgh Commission on Human Relations as the designated channel for community consultation. At the Commission's regular meeting of March 2, 1998, the principal investigator presented a slide presentation and summary of the study and addressed the Commissioners' questions and concerns. A lay summary of the study has been sent to all Commissioners' prior to the meeting. Representative IRB members also attended this session.
2. *Community notification.* After clearance from the UPMC News Bureau and the IRB, a press release was submitted to the Pittsburgh Post Gazette, the Pittsburgh Tribune Review, the New Castle News, the Clarion News, the Erie Daily Times, and The Vindicator (Youngstown, OH), as well as to television and radio stations in these communities. The communities were identified by the UPMC Trauma Center outreach coordinator to provide coverage of the Trauma Center catchment area. In addition, a paid advertisement (attached) was printed in the newspapers listed above on April 23, 1998. A telephone number and address for the Principal Investigator and the IRB were included in the advertisement to allow interested persons to communicate their comments. A summary of responses was submitted to the IRB.

Addendum

The process of applying for waiver of informed consent for this clinical study by providing public disclosure, community consultation and comment is as follows:

The Informed Consent for legal representatives was revised to add a decline to participate statement for this clinical study; the change was approved by the IRB Liaison.

Dr. F. [REDACTED], Dr. G. [REDACTED] and Ms. W. [REDACTED] reviewed the current survey language and submitted changes, to reflect the Memphis area to Dr. A. [REDACTED] (IRB Liaison). Changes were also incorporated from Dr. A. [REDACTED], who approved the document as the IRB Liaison; the revised survey was then sent to the Sponsor for review. Between March 7 and March 26, 1998, 508 respondents were interviewed over the phone by research assistants of Hebert Research. Residents of Tennessee, divided by Memphis and other, Arkansas, and Mississippi were selected at random using stratified probability sampling methods. Zipcodes in Tennessee, Arkansas, and Mississippi with the greatest number of patients admitted to the Trauma Center were included in the sample, proportional to the number of patients in each zipcode. The purpose of this survey was to provide unbiased community input to the Primary Investigator for use in gaining approval for the implementation of a waiver of informed consent in administering a newly developed drug to trauma patients in a clinical protocol. The results of this interview, and the verbatim comments of all the respondents are attached. Nearly two-thirds of the respondents indicated they would want the drug administered without written consent, under the condition that they would have a 25 to 50 percent chance of dying with standard treatment, and that administration of the drug might improve their chance of survival, but may increase their risk of bacterial infection.

This clinical protocol was presented to the Metropolitan Inter-Faith Association, Advisory Council/Retired Senior Volunteer Program on 4/20/98, which is a city-wide diverse group, independent of the University of Tennessee and the Trauma Center. This group was very receptive to receiving this drug under the waiver of informed consent.

Press releases were approved by the IRB Liaison, followed by Sponsor review on 4/24/98; currently, the Research Office at the Regional Medical Center is reviewing these three documents prior to release. The University of Tennessee Relations Officer (O. [REDACTED]) is assisting the Investigator with appropriate media contacts.

On 4/27/98, a presentation was made to the Shelby County Commission, Committee #3: Hospitals and Health. This Committee did not object to enrolling patients under waiver of informed consent. On 4/28/98 a print interview is scheduled with the largest daily newspaper. On 5/3/98, a radio interview is scheduled; this particular health show provides a call-in segment.

In each presentation and interview, the public is encouraged to contact the IRB with written assessment of the acceptability of conducting the protocol with a waiver of consent.